

GROSSMAN & RINALDO
ATTORNEYS AT LAW

STUART J. GROSSMAN
PAUL P. RINALDO

108-18 QUEENS BOULEVARD
8TH FLOOR, SUITE 5
FOREST HILLS, NEW YORK 11375
(718) 520-8722
FAX (718) 793-0894
E-MAIL: grossmanrinaldo@aol.com

April 24, 2008

BY ECF and Fax

Honorable Colleen McMahon
United States District Court Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Plutarco Angulo-Aguirre, et al.
07 CR 387(CM)

Dear Judge McMahon:

On behalf of all defendants in the above captioned case, I respectfully request an extension of time from April 29, 2008 until May 2, 2008 for the filing of any defense in limine motions and defense responses to the government's 404(b) motion. Since the filing of the government's 404(b) motion on April 15, 2008, the defendants and the government have been engaged in extensive and time consuming plea negotiations with a view toward obtaining a disposition of this matter for all defendants. Over the last week, including today, defense counsel have had three joint defendant/counsel meetings and a meeting with the government. Since no dispositions have been reached, defense counsel are requesting an additional three days within which to complete and file their submissions. Additionally, defendant Rodriguez requests the same date to file a reply to the government's response to his supplemental suppression motion.

Assistant United States Attorney Nola B. Heller has no objection to this request.

Respectfully submitted,

Paul P. Rinaldo

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cc: AUSA Nola B. Heller (Via Fax and ECF)
Sam M. Braverman, Esq. (Via Fax and ECF)
George E. Fufidio, Jr., Esq. (Via Fax and ECF)
Clinton W. Calhoun, Esq. (Via Fax and ECF)
Michael K. Burke, Esq. (Via Fax and ECF)